

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI

MORTGAGE RESEARCH CENTER, LLC)
(D/B/A VETERANS UNITED AND)
VETERANS UNITED HOME LOANS),)
Plaintiff,) Case No. 2:16-cv-4073
v.)
BROKER SOLUTIONS, INC. (D/B/A NEW)
AMERICAN FUNDING),)
Defendant.)

)

JURY TRIAL DEMANDED

PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION TO COMPLETE SERVICE

Plaintiff Mortgage Research Center, LLC, d/b/a Veterans United and Veterans United Home Loans (“Veterans United”), requests a two-week extension of time for service of the Complaint and related documents on Defendant Broker Solutions, Inc., d/b/a New American Funding (“New American”). In support of the requested extension, Veterans United states as follows:

1. Veterans United filed its Complaint in the above-captioned case on March 2, 2016. (Dkt. No. 1.)
2. Since the filing of the Complaint, the parties have engaged in substantive settlement negotiations.
3. The parties have agreed to the terms of a settlement that will resolve all claims in this case. The written settlement agreement is finalized, but, because of travel schedules of the parties’ representatives, signatures could not be obtained prior to the current deadline for service of the Complaint.

4. A two-week extension of time for service of the Complaint and related documents is necessary for the parties to execute the agreed-upon written settlement agreement and for Veterans United to file a dismissal of this case.

5. The undersigned has conferred with counsel for New American, and New American does not oppose the requested extension.

6. Veterans United has not previously sought an extension of the service deadline.

7. The requested two-week extension is not sought for any improper purpose or with any improper motive, nor would it prejudice any party or delay the proceedings.

WHEREFORE, Plaintiff Mortgage Research Center, LLC, respectfully moves the Court for a two-week extension, up to and including April 26, 2016, to effectuate service of the Complaint and related documents on Defendant Broker Solutions, Inc.

Date: April 14, 2016

Respectfully submitted,

LATHROP & GAGE LLP

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